

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,
v.

HEWLETT PACKARD ENTERPRISE
COMPANY,

Defendant.

Case No. 2:24-cv-00093-JRG
(Lead Case)

JURY TRIAL DEMANDED

VIRTAMOVE, CORP.,

Plaintiff,
v.

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

Case No. 2:24-CV-00064-JRG
(Member Case)

JURY TRIAL DEMANDED

**DECLARATION OF CHRISTIAN CONKLE IN SUPPORT OF PLAINTIFF
VIRTAMOVE, CORP.'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Christian Conkle, declare and state as follows:

1. I am a member of the State Bar of California and an attorney at the firm of Russ August & Kabat, and one of the attorneys for Plaintiff VirtaMove, Corp. in the above-captioned action. I submit this declaration in support of Plaintiff's Opening Claim Construction Brief. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of U.S. Patent No. 7,159,814, dated April 14, 2009.

3. Attached as Exhibit 2 is a true and correct copy of Amazon's Opening Claim Construction Brief in *VirtaMove, Corp. v. Amazon.com, Inc., et al.*, USDC WDTX Case No. 7:24-cv-00030-ADA-DTG, filed on October 22, 2024.

4. Attached as Exhibit 3 is a true and correct copy of Google's Opening Claim Construction Brief in *VirtaMove, Corp. v. Google LLC*, USDC WDTX Case No. 7:24-cv-00033-ADA-DTG, filed on October 22, 2024.

5. Attached as Exhibit 4 is a true and correct copy of Google's Reply Claim Construction Brief in *VirtaMove, Corp. v. Google LLC*, USDC WDTX Case No. 7:24-cv-00033-ADA-DTG, filed on November 26, 2024.

6. Attached as Exhibit 5 is a true and correct copy of U.S. Patent No. 7,784,058, dated August 24, 2010.

7. Attached as Exhibit 6 is a true and correct copy of the Declaration of Dr. Angelos Stavrou in *VirtaMove, Corp. v. Hewlett Packard Enterprise Company*.

8. Attached as Exhibit 7 is a true and correct copy of the File History for U.S. Patent No. 7,784,058.

9. Attached as Exhibit 8 is a true and correct copy of Provisional Patent Application No. 60/504,213

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed on February 21, 2025 in Los Angeles, California.

/s/ Christian Conkle
Christian Conkle